

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-cv-00950-LO-JFA

[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION TO COMPEL

Having considered Plaintiffs' Motion to Compel, filed on June 21, 2019, it is hereby ORDERED that the Motion is GRANTED. Accordingly, Defendants are hereby ordered to produce:

- (1) For the period of 2012 through 2014, Cox Communications, Inc.'s audited financial statements in full, including full auditor reports, notes, letters, opinions and narrative discussions and explanations concerning the financial statements from which COX_SONY_00974168 through COX_SONY_00974176 are excerpted;
- (2) The data underlying Cox's claim that [REDACTED], including any analysis or calculations thereof;
- (3) For the period of 2012 through 2014, CATS work logs notes for Cox business subscribers identified in Cox's ICOMS billing reports produced at COX_SONY_00973760 through COX_SONY_00973767;

- (4) The expert report(s) of William Rosenblatt submitted on behalf of Cox in *BMG Rights Management (US) LLC, et al. v. Cox Enterprises, Inc., et al.*, Case No. 1:14-cv-01611-LO-JFA (the “BMG Litigation”);
- (5) Video recordings of the depositions of Cox’s fact witnesses taken in the BMG Litigation;
- (6) Documents concerning Jason Zabek, Joseph Sikes, and Roger Vredenburg’s [REDACTED] [REDACTED] performance evaluations, and salary/bonus history from the period of 2010 through 2016;
- (7) For the period of 2012 through 2014, weekly or monthly abuse reports generated by abuse category; and
- (8) A 30(b)(6) witness prepared to testify to Cox's [REDACTED] [REDACTED]

It is so ORDERED this ____ day of _____, _____.

United States Magistrate Judge